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Attorney for the Debtors

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:	§	CASE NO. 18-30387-BJH-13
	§	
MARY CASTILLO	§	

MOTION TO SELL PROPERTY

Debtor Mary Castillo files this Motion to Sell Property, and for cause would show unto the Court as follows:

Debtor filed a Petition under Chapter 13 of the Bankruptcy Code on February 5, 2018. This Court has jurisdiction over this matter pursuant to 28 U.S.C. Section 1334. This is a core proceeding pursuant to 28 U.S.C. Section 157(b). This motion is filed pursuant to 11 U.S.C. Sections 1303 and 363(b). Included within Debtor's assets is a house located at 2719 Dewitt, Irving, Texas in Dallas County, Texas and being more fully described as Lot 3, Block 17 of Freeway Park 2 Addition, City of Irving, Texas and referred to herein as the "Property". Debtor has entered into a contract to sell the Property to Mehran Ajaz (the "Purchaser"). The Purchaser is not related to Debtor. The purchase price under the contract is \$195,000.00.

Upon the sale of the Property, the title company will withhold funds for closing costs. Then, the title company will pay the outstanding first mortgage and a mechanics lien. Debtor should net approximately \$95,000.

Debtor would show that it is in the best interest of the Debtor, and the creditors of the estate, that the Property be sold. Further, it would work an undue hardship on the Debtor if the sale is not allowed to proceed.

WHEREFORE, PREMISES CONSIDERED, Debtors pray for the following relief:

- (1). An Order of this Court allowing the sale of the Property.
- (2). For such other and further relief as Debtor may be entitled.

Respectfully submitted,

/s/ Lawrence Herrera

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